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IN THE UNITED STATES DISTRICT COURT

DISTRICT OF UTAH, NORTHERN DIVISION

UNITED STATES OF AMERICA,	:	Case No. 1:18-CR-00075 TC
Plaintiff,	:	
v.	:	SIXTEENTH NOTIFICATION OF
	:	COMPLIANCE AND REQUEST FOR
	:	RECIPROCAL DISCOVERY
ROBERT GLEN MOURITSEN,	:	
Defendant.	:	Judge Tena Campbell

The United States of America, by and through the undersigned, hereby files its notification of compliance with its discovery obligations in this case and request for reciprocal discovery from the defendant.

The United States gives notice that the following is being or has been provided to counsel for defendant:

Description	Bates Beg #	Bates End #
	INT-07-00470	INT-07-00472

As additional discoverable material becomes available, such material will be provided

within a reasonable time. Throughout this case, the United States will provide material discoverable under Rules 16 and 26.2 of the Federal Rules of Criminal Procedure and the Jencks Act without requiring the defendant to make a specific request for such material. Upon the request of the defendant, the United States will permit and facilitate the defendant's own inspection, copying or photographing of those items described/defined in Rule 16(a)(1)(E).

The United States also hereby requests disclosure of evidence by the defendant (also known as reciprocal discovery) pursuant to Rule 16(b) of the Federal Rules of Criminal Procedure and DUCrimR 16-1(c). By providing Rule 16 discovery without requiring a specific request from the defense, the United States invokes a reciprocal obligation on the defendant under DUCrimR 16-1(c), which states that the defendant must allow the government to inspect and to copy the following, as further defined in Rule 16 of the Federal Rules of Criminal Procedure:

- a. Documents and tangible objects the defendant intends to introduce as evidence at trial;
- b. Reports of examinations and tests the defendant intends to introduce at trial or that were prepared by a witness whom the defendant intends to call at trial; and
- c. A written summary of the testimony of any expert the defendant intends to use a trial under Federal Rules of Evidence 702, 703 and 705.

The United States requests that the defendant provide to the government at a reasonable time before trial, but no later than five working days before trial, copies of the material referenced in this paragraph. Further, the United States requests continuing compliance

with the reciprocal discovery following the initial disclosure.

The United States also hereby requests all written and recorded statements by any witness other than the defendant whom the defendant intends to call at trial or a hearing covered by the Jencks Act or Rule 26.2 of the Federal Rules of Criminal Procedure.

DATED this 11th day of September, 2019.

JOHN W. HUBER
United States Attorney

/s/ Jacob J. Strain
JACOB J. STRAIN
Assistant United States Attorney

Certificate of Service

I certify that on the 11th day of September, 2019, the SIXTEENTH NOTIFICATION OF COMPLIANCE AND REQUEST FOR RECIPROCAL DISCOVERY was filed electronically and caused to be served by electronic notice and/or via FedEx to the following:

Robert K. Hunt
UTAH FEDERAL DEFENDER OFFICE
46 W BROADWAY STE 110
SALT LAKE CITY, UT 84101

/s/ E. Hernandez
Litigation Support Specialist